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March 20, 2019

Senior Judge Frederic Block
United States District Court EDNY
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Tuline Jenkins, Adeleke Omole as Administrators For the Estate of Adedji Omole et al Vs
City of New York , et al 18 Cv 1145 (FB) (SJB) Letter Motion for additional time to answer
Letter Motion of Defendants Captain Britton, Correction Officers Lazanakis and Mauro

Dear Judge Block,

Inasmuch as your Honor ordered mediation in this case, which is currently scheduled with Mediator Richard Brewster to be completed by April 11, 2019, the letter motion of NYC Law Department by attorneys Andrew Rauchberg and Thomas CoPatrick on behalf of defendants Britton, Lazanakis and Mauro requesting a pre motion conference for its motion to dismiss will be moot if the mediation is successful.

Mindful of the importance of productive use of the Courts time, in order to give the Court ordered mediation opportunity to resolve all the issues of this litigation, as there has been significant progress to date as well as continued communication between the parties, it is respectfully requested the date of pre motion conference for this latest Motion To Dismiss be set for April 25, 2019 or such other date as the Court shall set therefor and date for Plaintiffs responsive filing be extended to April 18, 2019 . This is the first request for the relief requested herein. The adversaries and other attorneys involved in this action have no objection to this request.

In light of the above, I respectfully request that the Court extend the date for responsive filing by Plaintiffs to this motion to April 18, 2019 or such other date as will seem reasonable to the Court and that no pre motion conference be set before April 25, 2019.

Respectfully submitted,

Ira Weinstein
Attorney for Plaintiff Respondent

CC: Andrew Rauchberg, Thomas Copatrick Paul A Sanders, Kathleen Byrne, Stephen Kovatis, David MacMain